

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CASEY DUNNAM,)	
)	Case No. 3:24-cv-00231
<i>Plaintiff,</i>)	
)	JUDGE CRENSHAW
v.)	
)	MAGISTRATE JUDGE NEWBERN
WILSON COUNTY, TENNESSEE and BETSY)	
JAKALSKI, individually,)	JURY DEMANDED
)	
<i>Defendants.</i>)	

**DEFENDANT WILSON COUNTY, TENNESSEE’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S MOTION FOR SANCTIONS**

Defendant, Wilson County, Tennessee, by and through counsel, respectfully files this motion for an extension of time for Defendants to file a responsive brief in opposition to Plaintiff’s Motion for Sanctions and Memorandum of Law (Doc. 20). In support thereof, Defendant states as follows:

1. Defendants currently have until June 27, 2025 to file any responsive brief in opposition to Plaintiff’s Motion for Sanctions and Memorandum of Law.
2. Plaintiff filed this Motion for Sanctions and Memorandum of Law on June 13, 2025 during the time period in which Defendant was working on its Motion for Summary Judgement, Statement of Material Facts, and Supporting Memorandum, which were due to the Court on June 23, 2025.
3. Also during this time period, counsel for Defendant had previously committed to traveling out of state from June 18 through June 22, 2025 to be in her brother’s wedding and had no reasonable opportunity to perform work during the travel to and participation in this event.

4. Accordingly, Defendant's opportunity to respond to Plaintiff's Motion for Sanctions since its filing has been extremely limited.
5. Furthermore, counsel for Defendant previously agreed in good faith to allow Plaintiff to extend discovery deadlines to allow for two additional depositions and additional written discovery requests, which contributed to the tight deadlines between discovery motions and dispositive motions.
6. Given the nature of the allegations contained in Plaintiff's Motion for Sanctions and the severity of the Sanctions sought, Defendant requires additional time to file its reply.
7. Pursuant to local rule 7.01(a)(1), Defendant's counsel conferred with Plaintiff's counsel, and Plaintiff's counsel does not oppose this Motion.

Based on the foregoing, Defendant respectfully requests an extension of the date to file any responsive briefs in opposition to Plaintiff's Motion for Sanctions until and including July 9, 2025.

Respectfully submitted this 27th day of June, 2025.

s/ Emily K. Lambert
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CERTIFICATE OF SERVICE

The undersigned certifies that on the 27th day of June, 2025 a true and exact copy of the foregoing document was filed through the Court's ECF system, which will send a notice of electronic filing to all parties of interest in this case:

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